

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL INC.)	
and HONEYWELL INTELLECTUAL)	
PROPERTIES INC.,)	
)	
Plaintiffs,)	
)	C.A. No. 04-1338-***
v.)	(Consolidated)
)	
APPLE COMPUTER, INC., et al.,)	
)	
Defendants.)	

**MOTION FOR LEAVE TO FILE
REVISED SECOND AMENDED COMPLAINT**

Plaintiffs Honeywell International Inc. and Honeywell Intellectual Properties Inc. (“Honeywell”) hereby move the Court for leave to file a Revised Second Amended Complaint in the form attached here to as Exhibit A. The grounds for this motion are as follows:

1. On July 28, 2006, Honeywell filed a Motion for Leave to File a Second Amended Complaint (D.I. 515), and attached the proposed Second Amended Complaint to the Motion as Exhibit A. On October 23, 2007, the Court issued an Order granting Honeywell’s motion (D.I. 896).

2. On October 24, 2007, Honeywell filed the Second Amended Complaint which was attached to its Motion as an exhibit (D.I. 897). However, in the 15 months between the filing of Honeywell’s Motion and the Court’s Order, many of the defendants named in the Second Amended Complaint settled and were dismissed from the case.

3. Therefore, Honeywell has prepared a Revised Second Amended Complaint, which is attached hereto as Exhibit A, for the purpose of removing the following previously-named defendants who have been dismissed from this case: Arima Display

Corporation; AU Optronics Corp.; AU Optronics Corporation America; BOE Technology Group Company Ltd.; Beijing BOE Optoelectronics Technology Co., Ltd.; Casio Computer Co., Ltd.; Casio, Inc.; Citizen Systems Europe; Citizen Systems America Corporation; Fuji Photo Film Co., Ltd.; Fuji Photo Film U.S.A., Inc.; Fuji Photonix Co., Ltd.; HannStar Display Corporation; Hitachi, Ltd.; Hitachi Displays, Ltd.; Hitachi Display Devices, Ltd.; Hitachi Electronic Devices (USA), Inc.; International Display Technology; International Display Technology USA, Inc.; Koninklijke Philips Electronics N.V.; Philips Consumer Electronics North America; Philips Electronics North America Corporation; Quanta Display Inc.; Sony Corporation of America; ST Liquid Crystal Display Corp.; Toppoly Optoelectronics Corp.; TPO Displays Corporation; Wintek Corp.; Wintek Electro-Optics Corporation; Wistron Corporation; M-Display Optronics Corp.; Seiko Epson Corporation; Epson Imaging Devices Corporation; and Sanyo Epson Imaging Devices Corp. A red-lined version of the proposed Revised Second Amended Complaint is attached hereto as Exhibit B.

WHEREFORE, Honeywell respectfully requests that the Court grant leave to file the Revised Second Amended Complaint. A proposed form of Order is attached hereto as Exhibit C.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Thomas C. Grimm

Thomas C. Grimm (#1098)
Benjamin J. Schladweiler (#4601)
1201 N. Market Street
P.O. Box 1347
Wilmington, DE 19899-1347
(302) 658-9200
tgrimm@mnat.com
bschladweiler@mnat.com
Attorneys for Plaintiffs

OF COUNSEL:

Martin R. Lueck
Matthew L. Woods
Stacie E. Oberts
Denise S. Rahne
Peter N. Surdo
Marta M. Chou
ROBINS, KAPLAN, MILLER
& CIRESI L.L.P.
2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402-2015
(612) 349-8500

Anthony A. Froio
Marc N. Henschke
Alan E. McKenna
Michael J. Garko
ROBINS, KAPLAN, MILLER
& CIRESI L.L.P.
800 Boylston Street, 25th Floor
Boston, MA 02199
(617) 267-2300

November 6, 2007
1299834

CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2007, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing to all registered participants.

I also certify that on November 6, 2007, I caused to be served true and correct copies of the foregoing on the following as indicated below:

BY HAND & E-MAIL:

Karen L. Pascale
YOUNG CONAWAY STARGATT
& TAYLOR, LLP
The Brandywine Building, 17th floor
1000 West Street
Wilmington, DE 19801
kpascale@ycst.com

Attorneys for Optrex America, Inc.

Philip A. Rovner
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th Floor
1313 N. Market Street
P.O. Box 951
Wilmington, DE 19899
provner@potteranderson.com

*Attorneys for FUJIFILM Corporation
and FUJIFILM U.S.A., Inc.*

David J. Margules
John M. Seaman
BOUCHARD MARGULES
& FRIEDLANDER, P.A.
222 Delaware Ave., Suite 1400
Wilmington DE 19801
dmargules@BMF-law.com

*Attorneys for Citizen Watch Co., Ltd.
and Citizen Displays Co., Ltd.*

Matt Neiderman
DUANE MORRIS LLP
1100 North Market Street, 12th Floor
Wilmington, DE 19801-1246
MNeiderman@duanemorris.com

Attorneys for InnoLux Display Corporation

Richard L. Horwitz
David E. Moore
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th Floor
1313 N. Market Street
P.O. Box 951
Wilmington, DE 19899
rhorwitz@potteranderson.com

*Attorneys for Samsung SDI America, Inc.
and Samsung SDI Co., Ltd.*

BY E-MAIL:

Andrew M. Ollis
OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.
1940 Duke Street
Alexandria, VA 22314
aollis@oblon.com

Attorneys for Optrex America, Inc.

Stephen S. Korniczky
Elizabeth L. Brann
PAUL, HASTINGS, JANOFSKY
& WALKER LLP
3579 Valley Centre Drive
San Diego, CA 92130
stephenkorniczky@paulhastings.com
elizabethbrann@paulhastings.com

Hamilton Loeb
PAUL, HASTINGS, JANOFSKY
& WALKER LLP
875 15th Street, N.W.
Washington, DC 20005
hamiltonloeb@paulhastings.com

*Attorneys for Samsung SDI Co., Ltd.
and Samsung SDI America, Inc.*

Stuart Lubitz
HOGAN & HARTSON LLP
1999 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
slobitz@hhlaw.com

*Attorneys for Citizen Watch Co., Ltd.
and Citizen Displays Co., Ltd.*

Lawrence Rosenthal
Matthew W. Siegal
STROOCK & STROOCK & LAVAN LLP
180 Maiden Lane
New York, NY 10038-4982
lrosenthal@stroock.com
msiegal@stroock.com

*Attorneys for FUJIFILM Corporation
and FUJIFILM U.S.A., Inc.*

Donald R. McPhail
DUANE MORRIS LLP
1667 K Street, N.W., Suite 700
Washington, DC 20006
drmcphail@duanemorris.com

Attorneys for InnoLux Display Corporation

BY FEDERAL EXPRESS

Mr. Seong Yoon Jeong
Assistant Manager
Technology Planning Group
BOE HYDIS TECHNOLOGY CO., LTD.
San 136-1, Ami-ri, Bubal-eub
Ichon-si, Gyeonggi-do 467-701
Republic of Korea

/s/ Thomas C. Grimm

Thomas C. Grimm (#1098)
tgrimm@mnat.com